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4 Attorney for:
5 CHARLIE JIM PETERS
6

7 **UNITED STATES DISTRICT COURT**
8 **FOR THE EASTERN DISTRICT OF WASHINGTON**
9 **(Honorable Stanley A. Bastian)**
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CHARLIE JIM PETERS,

15 Defendant.
16

No. 20-CR-2046-SAB-1

MOTION TO EXPEDITE

September 23, 2021 at 6:30 PM
Yakima, WA – Without Oral
Argument

17 COMES NOW, Ken Therrien, attorney for defendant Charlie Jim Peters and moves
18 the court to consider on an expedited basis the Motion and Declaration to Continue Pretrial
19 Conference and Trial Date. This motion is based on the files and records herein and the
20 below-signed Declaration of Counsel.
21

22 **DECLARATION OF COUNSEL**

23 I, Ken Therrien, hereby declare as follows:

24 1. I am over the age of eighteen and competent to testify regarding the matters
25 contained herein;

1 2. I am an attorney for the defendant, Charlie Jim Peters.

2 3. I have notified AUSA Matthew Stone regarding this request.

3 4. This matter is scheduled for trial on October 25, 2021.

4 5. Consequently, I am requesting that the Motion and Declaration to Continue
5 Pretrial Conference and Trial Date be heard on an expedited basis to allow the Court time
6 to address this matter sufficiently in advance of trial.

7
8 I certify under penalty of perjury under the laws of the State of Washington and of
9 the United States of America that the foregoing is true and correct.

10 Dated this 22nd day of September, 2021.

11 /s/ Ken Therrien

12 KEN THERRIEN, WSBA #20291

13 Attorney for Charlie Jim Peters

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the State of Washington that on September 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

- Michael Murphy, Assistant United States Attorney
- Matthew Stone, Assistant United States Attorney

/s/ Eric Eisinger, WSBA #34293 for
KEN THERRIEN, WSBA #20291
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